

**EXHIBIT 4** to Supplemental Affidavit of Jeffery D. Ubersax

Mar-20-2006 08:11pm From-CONN KAVANAUGH

617-482-6444

T-460 P.002/003 F-249

## CONN KAVANAUGH ROSENTHAL PEISCH &amp; FORD, LLP

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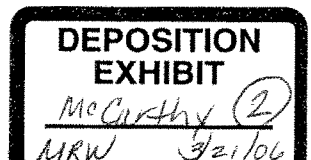
March 20, 2006

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KURT B. FLIEGAUFVIA E-MAIL, FACSIMILE AND FIRST CLASS MAILJeffrey D. Ubersax, Esq.  
Jones Day  
North Point  
901 Lakeside Avenue  
Cleveland, OH 44114-1190Re: Suzanne Genereux, et al. v. American Beryllia Corp., et al.

Dear Jeff:

As we have discussed, Mr. James McCarthy is Raytheon's first and primary Rule 30(b)(6) designee. With respect to the subject matters set forth in the Rule 30(b)(6) subpoena, Mr. McCarthy is Raytheon's designee as follows:

- Nos. 1 and 2: While Mr. McCarthy might have some limited general personal knowledge about these subject matters, he is not the designee.
- Nos. 3 and 4: Mr. McCarthy is the designee insofar as he has personal knowledge of these subject matters.
- Nos. 5 and 6: Mr. McCarthy is not the designee.
- No. 7: Mr. McCarthy is Raytheon's designee to the extent this subject matter includes OSHA specifications.
- No. 8: Mr. McCarthy is not the designee.
- No. 9: Mr. McCarthy is Raytheon's designee with respect to "Raytheon's industrial hygiene equipment and policies and practices at the Waltham Plant to protect workers against beryllium exposure, including but not limited to Standard #37-3066-130." Mr. McCarthy is not the designee with respect to "the glove box and any related ventilation equipment used by Suzanne Genereux."
- No. 10: Mr. McCarthy is the designee with respect to Raytheon's Northboro facility.



Mar-20-2006 06:11pm From-CONN KAVANAUGH

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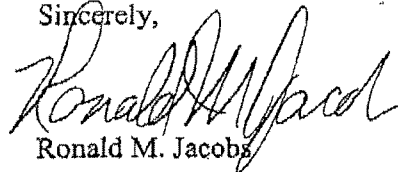
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- No. 11: Mr. McCarthy is Raytheon's designee with respect to "[m]easurements of airborne beryllium particulate at the Waltham Plant" in 1991.
- Nos. 12 and 13: Mr. McCarthy is the designee for the Waltham Plant.
- No. 14: Mr. McCarthy is the designee.
- No. 15: Mr. McCarthy is not the designee but might have some limited personal knowledge.
- No. 16: Mr. McCarthy is the designee.
- No. 17: Mr. McCarthy is not the designee but might have some limited personal knowledge.
- Nos. 18 and 19: Mr. McCarthy is the designee for the Waltham Plant from at least 1986 and for the Northboro facility from at least 1999.
- Nos. 20 - 24: Mr. McCarthy is not the designee but can testify as a fact witness as to communications, if any, during his employment between Raytheon's health and safety office and the entities specified in these subject matters.
- Nos. 25 - 27: Mr. McCarthy is not the designee.
- No. 28: Mr. McCarthy is the designee.
- No. 29: While Mr. McCarthy has personal knowledge of the job titles and responsibilities of some of the individuals listed, he is not the designee.

Sincerely,



Ronald M. Jacobs

RMJ/sf-6676-122

cc: James F. Kavanaugh, Jr., Esq.  
Alan M. Spiro, Esq. (via e-mail, facsimile and first class mail)